**NEW YORK** One Newark Center LOS ANGELES Newark, NJ 07102-5211 WASHINGTON BOSTON Telephone 973.274.3200 **BOCA RATON** or 212.736.8185 NEW ORLEANS PROSKAUER ROSE LLP Fax 973.274.3299 **PARIS** A NEW YORK LIMITED LIABILITY PARTNERSHIP Marvin M. Goldstein, Managing Resident Partner **USDC SDNY** Marguerite Stenson Wynne ttomey at Law DOCUMENT ELECTRONICALLY FILED Direct Dial 973.274.3260 nwynne@proskauer.com DOC #: DATE FILED: 2 May 16, 2005 **VIA OVERNIGHT MAIL** Honorable Alvin K. Hellerstein, U.S.D.J. MAY 1 6 2005 **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007 Al /r EIN Trustees of the Mason Tenders District Council Welfare Fund, et al.

## Dear Judge Hellerstein:

Re:

We are counsel for the plaintiffs in the above-referenced action. Enclosed is a courtesy copy of the following papers that were filed in this action on May 13, 2005, in support of plaintiffs' motion for default judgment pursuant to Fed. R. Civ. P. 55:

1. Notice of Motion and Certificate of Service;

05 Civ. 2137 (AKH) [ECF Case]

v. Bedrock Development, Inc. and Sean Flaherty

2. Proposed default judgment and supporting Statement of Judgment, Affidavit with Exhibits A-C, Clerk's Certificate, and Certificate of Service.

We have received a Notice of Court Conference scheduling an initial case management and scheduling conference in this matter on June 24, 2005. In light of plaintiffs' motion for default judgment, we respectfully request that the conference be adjourned pending plaintiffs' motion.

Respectfully submitted,

Enclosures

The conference probable for June 21,2005 all Holts